

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SUZANNE GREENE,

Plaintiff,

vs.

Civil Action No. 1:19-cv-1338-AT

TYLER TECHNOLOGIES, INC.,

Defendant.

**DEFENDANT'S ANSWERS AND OBJECTIONS TO
PLAINTIFF'S FIRST CONTINUING INTERROGATORIES TO DEFENDANT**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Tyler Technologies, Inc. ("Tyler") serves the following Answers and Objections to Plaintiff's First Continuing Interrogatories as follows:

Identify all Documents that You contend evidence Plaintiff's actual hours worked in each workweek.

ANSWER: Tyler believes that Plaintiff has knowledge of the hours she worked during the relevant time period and that such hours are accurately reflected in her time records produced by the parties in this case.

INTERROGATORY NO. 9: If You contend that You acted in "good faith" with respect to Plaintiff's compensation (within the meaning of 29 U.S.C. §§ 259 or 260) or did not "willful[ly]" violate the FLSA (within the meaning of 29 U.S.C. § 255), State fully the factual basis for such contention and Identify any Documents that evidence the factual basis of that contention.

ANSWER: Tyler's "good faith" and lack of "willfulness" as to Plaintiff's exempt classification is supported by, 1.) the fact that Plaintiff was classified as exempt by her previous employer which Tyler acquired in June of 2016; 2.) the fact that other similarly-situated employees are classified as exempt in the industry; and 3.) the fact that Plaintiff's job duties, as set forth in Tyler's response to Interrogatory No. 1 herein, demonstrate that she qualified as an exempt administrative employee under the FLSA.

INTERROGATORY NO. 10: If You contend that You acted in "good faith" with respect to Plaintiff's compensation (within the meaning of 29 U.S.C. §§ 259 or 260) or did not "willful[ly]" violate the FLSA (within the meaning of 29 U.S.C. § 255), Identify every Person from whom you have received advice (including but not